

Nancy L. Alper

Pro Hac Vice

Catherine A. Jackson

Pro Hac Vice

Leonor Miranda

Pro Hac Vice

**OFFICE OF THE ATTORNEY
GENERAL FOR THE DISTRICT OF
COLUMBIA**

600 6th Street N.W.

10th Floor

Washington, D.C. 20001

(202) 727-3400 (telephone)

(202) 347-8922 (fax)

Email: Nancy.Alper@dc.gov

Email: Catherine.Jackson@dc.gov

Email: Leonor.Miranda@dc.gov

**COUNSEL FOR THE DISTRICT OF
COLUMBIA, BY KARL A. RACINE,
ATTORNEY GENERAL FOR THE
DISTRICT OF COLUMBIA**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

**NATIONAL RIFLE ASSOCIATION
OF AMERICA and SEA GIRT LLC,**

Debtors.¹

§

§

§

§

§

§

CASE NO. 21-30085-hdh-11

CHAPTER 11

Jointly Administered

**THE DISTRICT OF COLUMBIA'S MOTION IN SUPPORT IN THE STATE OF NEW
YORK'S MOTION TO DISMISS**

**TO THE HONORABLE HARLIN D. HALE,
CHIEF UNITED STATES BANKRUPTCY JUDGE:**

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

1. The District of Columbia (the “District”), through its Attorney General, a party-in-interest in the above-referenced bankruptcy proceeding, hereby files this Motion in Support of the State of New York’s Motion to Dismiss² (“District’s Motion”).

2. On February 23, 2021, the District filed its Motion in Support of the State of New York’s Motion to Appoint Chapter 11 Trustee (“Motion to Support”) [Docket No. 214]. In that motion, the District agreed with the State of New York (“New York”) that, to the extent that the Debtor National Rifle Association of America, Inc. (NRA) is using the bankruptcy process to subvert the regulatory authority and oversight of the state of New York where the NRA is duly incorporated, this action is improper and abusive of the authority and purposes of this Court.

3. Since the filing of the District’s Motion in Support, documents and testimony provided in these proceedings have shown that the NRA’s use of the bankruptcy process was not duly authorized by its Board, and that the NRA’s Executive Vice President circumvented the NRA’s requirements that its Board authorize such actions.

4. Given this conduct in circumvention of Board authority, the District concurs with New York that the NRA’s petition was filed absent the requisite good faith, and good cause exists to warrant dismissal.

5. For these reasons, the District now joins New York’s request to dismiss the NRA’s Petition.

Dated: March 26, 2021

Respectfully submitted,

KARL A. RACINE
Attorney General for the District of Columbia

² The State of New York’s Motion to Dismiss, or, in the Alternative, to Appoint a Chapter 11 Trustee [Docket No. 155] and State of New York Brief in Support of Motion to Dismiss, or in The Alternative Appoint Chapter 11 Trustee (Feb. 12, 2021) [Docket No. 156].

KATHLEEN KONOPKA
Deputy Attorney General
Public Advocacy Division

JIMMY R. ROCK
Assistant Deputy Attorney General
Public Advocacy Division

Catherine A. Jackson
CATHERINE A. JACKSON (D.C. Bar # 1005415)
Chief, Public Integrity Section

Nancy L. Alper
NANCY L. ALPER (D.C. Bar # 411324)
Senior Assistant Attorney General
Commercial Division

/s/ Leonor Miranda
LEONOR MIRANDA (D.C. Bar # 1044293)
Assistant Attorney General
Office of the Attorney General for the
District of Columbia
400 6th Street, N.W., 10th Floor
Washington, D.C. 20001
(202) 727-3400 (telephone)
(202) 347-8922 (fax)
Leonor.Miranda@dc.gov
Catherine.Jackson@dc.gov
Nancy.Alper@dc.gov

Attorneys for the District of Columbia

CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2021, a true and correct copy of the foregoing was served upon all parties entitled to notice, including the Debtors and United States Trustee, via the Court's electronic transmission facilities.

/s/ Nancy L. Alper
NANCY L. ALPER
Senior Assistant Attorney General
Attorney for the District of Columbia